

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

JAMES G. ABOUREZK, JANE FONDA, and  
ROXANNE DUNBAR-ORTIZ,

Plaintiffs,

vs.

PROBUSH,COM, INC., a Pennsylvania  
Corporation, MICHAEL MARINO, an  
individual and BENJAMIN MARINO, an  
individual,

Defendants.

Civ. 03-4146

**STIPULATION AND MOTION  
TO EXTEND DEADLINES**

COMES NOW the Parties, represented by and through counsel, with this Stipulation and Motion to Extend Deadlines in light of the addition of new parties.

THE PARTIES HEREBY STIPULATE, by and through their attorneys, that the Scheduling Order be modified as follows:

That Plaintiff Jane Fonda be allowed until June 3, 2005, to file her verification of the Amended Verified Complaint.

All Motions, other than Motions in Limine, together with supporting briefs, shall be filed and served on or before July 2, 2005; that opposing parties shall file and serve answering materials and briefs on or before July 23, 2005; and reply briefs shall be filed and served on or before August 3, 2005.

That final lists of witnesses and exhibits under Rule 26(a)(3) shall be filed and served by Plaintiff and by Defendant ten (10) working days before trial, and the parties shall have five (5) days after service of such lists to file and serve objections thereto under Rule 26(a)(3).

All motions in limine, with supporting authority, shall be in writing and filed, together with proposed instructions, with support authority, with the Court ten (10) working days before trial.

THE PARTIES ALSO HEREBY MOVE the Court for modification of the Scheduling Order to reflect the newly stipulated dates noted above.

Dated this 2nd day of May, 2005.

JOHNSON, HEIDPRIEM, MINER,  
MARLOW & JANKLOW, LLP

**/S/ RONALD A. PARSONS, JR.**

*Filed Electronically*

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*Attorneys for Defendant*

Dated this 2nd day of May, 2005.

ABOUREZK & EPP

**/S/ TODD EPP**

*Filed Electronically*

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